

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
(Southern Division)**

In re)	
)	Chapter 9
CITY OF DETROIT, MICHIGAN,)	
)	Case No. 13-53846-swr
Debtor.)	
)	Hon. Steven W. Rhodes
_____)	

**EXHIBIT LIST OF HYPOTHEKENBANK FRANKFURT AG, HYPOTHEKENBANK
FRANKFURT INTERNATIONAL S.A., AND ERSTE EUROPAISCHE PFANDBRIEF-
UND KOMMUNALKREDITBANK AKTIENGESELLSCHAFT IN LUXEMBURG S.A.,
FOR HEARING ON (A) MOTION OF DEBTOR FOR ENTRY OF AN ORDER (I)
AUTHORIZING THE ASSUMPTION OF THAT CERTAIN FORBEARANCE
AGREEMENT AND OPTIONAL TERMINATION AGREEMENT PURSUANT TO
SECTION 365(a) OF THE BANKRUPTCY CODE, (II) APPROVING SUCH
AGREEMENT PURSUANT TO RULE 9019, AND (III) GRANTING RELATED RELIEF
AND (B) THE MOTION OF THE DEBTOR FOR A FINAL ORDER PURSUANT TO 11
U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921, AND 922 (I)
APPROVING POST-PETITION FINANCING, (II) GRANTING LIENS AND
PROVIDING SUPERPRIORITY CLAIM STATUS AND
(III) MODIFYING AUTOMATIC STAY AND THE OBJECTIONS THERETO**

Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., a Luxembourg stock corporation (collectively, “ECPK”), by their undersigned attorneys, hereby file this Exhibit List for Hearing on (a) the Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance Agreement and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief (Docket No. 157) and (B) the Motion of the Debtor for a Final Order Pursuant to 11 U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921, and 922 (I) Approving Post-Petition Financing, (II) Granting

Liens and Providing Superpriority Claim Status and (III) Modifying Automatic Stay and the Objections Thereto (Docket No. 1520) (collectively, the “Motions”).

EXHIBIT	DESCRIPTION
1.	Solicitation Materials to Prospective Lenders (Letter and Term Sheet) (Bates Nos. DTPFF016682-016687)
2.	Project Piston Cash Flow Forecast- Through 2017- dated September 10, 2013 (Bates Nos. DTPFF020055-020071)
3.	Email dated September 27, 2013 from Bruce Bennett (Bates No. DTPFF0516)
4.	September 16, 2013 letter from Barclays (Bates Nos. DTPFF013896-013920)
5.	Post-Petition Financing Discussion dated September 26, 2013 (Bates Nos. DTPFF020215-020225)
6.	Commitment Letter Summaries (Draft) dated October 3, 2013 (Bates Nos. DTPFF 020226-020231)
7.	Letter from Kevyn Orr to Andrew Dillon dated October 8, 2013 (Bates Nos. DTPFF0528-0529)
8.	Letter from Andrew Dillon to Kevyn Orr dated October 11, 2013 (Bates Nos. DTPFF 012928-012929)
9.	Briefing Materials for City Council dated October 7, 2013 (Bates Nos. DTPFF020039- 020071)
10.	Briefing Materials for City Council dated October 17, 2013 (Bates Nos. DTPFF012993- 013024)
11.	Briefing Materials for Financial Advisory Board (Bates Nos. DTPFF01959-01968)
12.	Emergency Manager’s Order regarding Postpetition Financing
13.	Commitment Letter
14.	Fee Letter
15.	Bond Purchase Agreement- Quality of Life Loan

16.	Bond Purchase Agreement- Swap Termination Loan
17.	Trust Indenture
18.	Engagement Letter for Exit Financing (Bates Nos. DTPFF012973-012984)
19.	City Council Resolution
20.	Email correspondence and attachments (Bates Nos. DTPFF0162-0173)
21.	Correspondence to Local Emergency Financial Assistance Loan Board dated November 6, 2013, and enclosures (Bates Nos. DTPFF20232-20356)

EEPK may also introduce or rely upon portions of the deposition transcripts of Charles Moore, James Doak, Kevyn Orr, Kenneth Buckfire, and Guarav Maholtra for purposes of impeachment, to the extent such witnesses are not available, or to the extent the City does not call such witnesses to testify at the hearing on the Motions.

EEPK further reserves the right (a) to introduce exhibits not included in this Exhibit List as rebuttal to any testimony or evidence presented by the City, and (b) to use or rely upon exhibits (i) introduced by the City as part of its case in chief and (ii) exhibits identified or introduced by any other creditor or party in interest that has objected to the Motions. By reserving the right to use or rely upon exhibits introduced by the City or by an other creditor or party in interest that has objected to the Motions, EEPK does not waive any objections to admissibility on any grounds.

Because discovery is ongoing and depositions have not been completed, EEPK reserves the right to amend, supplement, or modify this Exhibit List.

December 9, 2013.

Respectfully submitted,

/s/ Matthew G. Summers

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Aktiengesellschaft in Luxemburg S.A.*

CERTIFICATE OF SERVICE

I, Matthew G. Summers, state that on December 9, 2013, I filed a copy of the foregoing Exhibit List with the Clerk of Court using the Court's ECF system and I hereby certify that the Court's ECF system has served all registered users that have appeared in the above-captioned case. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Matthew G. Summers

Matthew G. Summers

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